

Exhibit A

Plaintiff's Search Proposal
December 1, 2021

I. Item 1

A. Custodians

1. Michelle Bonds
2. Amy Heldman
3. Kate Galatas
4. Benjamin Haynes
5. Bert Kelly
6. Erin Burns
7. Lynn Sokler
8. Sara Bedrosian
9. Molly Gaines-McCollum
10. Brad Meyers
11. Carol Williams
12. Peter Jenkins
13. Carol Crawford
14. Bill Hall
15. John O'Connor
16. Betsy Mitchell
17. Kelly Holton
18. Heather Bair-Break
19. John Anderton
20. Christy Spring
21. Dagny Olivares
22. Robert Redfield
23. Anne Schuchat
24. Sherri Berger
25. Nancy Messonnier
26. Katherine Lyon Daniel

B. Proposed Boolean search strings, to be used to search the subject-line and body of emails in custodians' inboxes:

1. Subject-line search only: (coronavirus OR COVID OR COVID-19 OR nCoV OR n-Cov OR 2019-nCov) AND (comms OR communication OR communications OR media)
2. (comms OR communication OR communications OR media) NEAR(5) (guide OR guidance OR process OR processes OR procedure OR procedures OR strategy OR strategies OR policy OR policies)

Knight First Amendment Institute at Columbia University v. CDC, et al.

Case No. 1:20-cv-02761-AT

3. (coronavirus OR COVID OR COVID-19 OR nCoV OR n-Cov OR 2019-nCov) AND ((prohibit! OR forbid! OR ban OR prevent!) NEAR(10) (speak! OR speech! OR talk! OR interview! OR messag!))
4. (coronavirus OR COVID OR COVID-19 OR nCoV OR n-Cov OR 2019-nCov) AND ((approv! OR allow! OR clear! OR (sign! /2 off)) NEAR(10) (speak! OR speech! OR talk! OR interview! OR messag!))

II. Item 2

A. Custodians

1. Robert Redfield
2. Anne Schuchat
3. Michelle E. Bonds
4. Jay C. Butler
5. Martin Cetron
6. Cate Shockey
7. John Dreyzehner
8. Amy Heldman
9. Kate Galatas
10. Katherine Lyon Daniel
11. Jennifer Madans
12. Nancy Messonnier
13. Stephen Redd
14. Sara Bedrosian
15. Susan Laird
16. Carol Crawford
17. Jay Dempsey
18. Agnes Warner
19. Robert (Kyle) McGowan
20. Sherri Berger
21. Amanda Campbell
22. Henry Walke
23. Jenni McQuiston
24. Dana Meany-Delman
25. Michael Beach
26. Athalia Christie
27. Amanda Cohn
28. Ashley Knotts
29. Elizabeth Hoo
30. Charlotte Kent

B. Proposed Boolean search strings, to be used to search the subject-line and body of emails in custodians' inboxes:

1. elevate! AND (clear! NEAR(25) (media OR press OR reporter! OR journalist! OR interview!))
2. centralize! NEAR(10) ("comms" OR communication OR communications)
3. (clear! OR approv! OR coordinat! OR (sign! /2 off)) NEAR(15) (comms OR communication OR communications OR media OR press OR reporter! OR journalist! OR interview! OR briefing) NEAR(25) (WH OR "White House" OR EOP OR "Vice President" OR VP OR OVP OR Pence OR Mulvaney OR Mick OR Birx OR ASPA OR "Assistant Secretary for Public Affairs" OR "task force" OR taskforce)
4. ((clear! OR approv! OR coordinat! OR (sign! /2 off)) NEAR(15) ("comms" OR communication OR communications OR media OR press OR reporter! OR journalist! OR interview! OR briefing)) NEAR(50) (Henning OR Davari OR Horstman OR Burris OR Bowman OR Porter OR Yanick OR Syrek OR Nance OR Miller OR Troye OR Macinnis OR O'Malley OR Fetalvo OR "Kelly Love")
5. For the limited date range of February 25, 2020 to March 1, 2020: (Nancy OR Messonnier) AND (press OR media OR journalist! OR reporter! OR "public relations" OR briefing OR telebriefing OR "news release" OR interview! OR "community spread")
6. Search of Nancy Messonnier's email for the limited date range of February 25, 2020 to March 1, 2020: All communication with eop.gov email addresses, Robert Redfield, Anne Schuchat, or Michelle Bonds.